

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
) No. 08 CR 888
v.)
) Hon. James B. Zagel
)
WILLIAM CELLINI)

**GOVERNMENT'S UNOPPOSED MOTION FOR LEAVE TO FILE
EXHIBIT TO GOVERNMENT'S MOTION TO DISQUALIFY COUNSEL UNDER SEAL
AND TO FILE BRIEF IN EXCESS OF 15 PAGES**

The United States, by and through PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully moves this Court for leave to file an exhibit to Government's Motion To Disqualify Counsel under seal, and to file a brief in excess of 15 pages, stating as follows:

1. Exhibit D to the Government's Motion To Disqualify Counsel is a one-page billing sheet for legal services provided by Winston & Strawn to Thomas Rosenberg. In light of the confidential information contained in the billing sheet, the government asks permission to file that exhibit under seal.
2. The government has attempted to be concise, but was not able to confine its motion to disqualify to under 15 pages. The government's response is 23 pages in length.
3. Thomas Kirsch, counsel for William Cellini, has indicated that his client has no objection to either request in this motion.

WHEREFORE, for the reasons stated above, the government respectfully asks that the Court place Exhibit D to the Government's Motion To Disqualify Counsel under seal and allow the government to file a brief in excess of 15 pages.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By: s/ Christopher Niewoehner
CHRISTOPHER S. NIEWOEHNER
REID J. SCHAR
CARRIE HAMILTON
Assistant United States Attorneys
219 S. Dearborn Street, 5th Floor
Chicago, Illinois 60604
(312) 353-6117

CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that the following documents:

GOVERNMENT'S UNOPPOSED MOTION FOR LEAVE TO FILE
EXHIBIT TO GOVERNMENT'S MOTION TO DISQUALIFY COUNSEL UNDER
SEAL AND TO FILE BRIEF IN EXCESS OF 15 PAGES

was served on December 17, 2008, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ Christopher Niewoehner
CHRISTOPHER S. NIEWOEHNER
Assistant United States Attorney
219 South Dearborn Street
5th Floor
Chicago, Illinois 60604
(312) 353-6117